

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
PITTSBURGH DIVISION**

**IN RE:**

**CASE NO.: 15-22705-CMB  
CHAPTER 13**

**Gregory M. Chaklos,  
And  
Kim L. Chaklos  
Debtors.**

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**SECURED CREDITOR'S RESPONSE TO MOTION FOR DETERMINATION OF  
FINAL CURE**

Home Point Financial Services ("Secured Creditor"), by and through its undersigned attorney, hereby files its Response to Motion for Determination of Final Cure [Docket No. 126] and in support thereof represents:

1. On July 28, 2015 Gregory M. Chaklos and Kim L. Chaklos ("Debtors"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code.
2. Secured Creditor holds an interest in Debtor's real property located at 100 Floral Hill Dr. Washington, Pennsylvania 15301.
3. Secured Creditor has reviewed the Chapter 13 Trustee's ledger as well as the internal ledger.
4. Secured Creditor has identified numerous transactions within the Chapter 13 Trustee's ledger that are not contained in Secured Creditor's internal records.
5. Secured Creditor is in the process of researching the specific disparate items between the two ledgers; but requires additional time to complete this review.

Dated: September 9, 2020

Respectfully submitted,

**ROBERTSON, ANSCHUTZ & SCHNEID, P.L.**  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 9, 2020 I caused to be electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

Gregory M. Chaklos  
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